

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
SHERMAN DIVISION

FILED
U.S. DISTRICT COURT
EASTERN DISTRICT OF TEXAS

AUG 30 2013

BY DEPUTY

PAUL CLARENCE BAILEY,
Plaintiff,

v.

Case No. 4:13cv502
Judge Clark

COLLIN COUNTY, TEXAS)
CITY OF FRISCO)
CITY OF FRISCO POLICE DEPARTMENT)
DALLAS, TEXAS)
DALLAS COUNTY JAIL)
FRISCO POLICE CHIEF TODD RENSHAW)
FRISCO POLICE OFFICER SCOTT GREER)
FRISCO POLICE SERGEANT BRIAN SARTAIN)
TEXAS DEPARTMENT OF CRIMINAL JUSTICE)
JPAY.COM
Defendants.

COMPLAINT

Now, comes Plaintiff Paul Clarence Bailey, having suffered extensively at the hands of the Defendants, files suit for violations of the Civil Rights Act of 1964 section 1983 and Civil Rights Act of 1871.

Due to repeated cruel and unusual punishments, and repeated relocations that interrupt cognate and constant communications with friends and family members to assist in perfecting submission(s) to the court, and deliberate interruptions and/or improperly administered, required medication(s) and/or supplementations that are life sustaining!

The Plaintiff/Defendants, has via the aforementioned civil rights violations, threatened the life of this Plaintiff/Defendant upon numerous occasions and such as are documented facts within this motion validated by the advert of several emergency transports to hospital(s) neccasitated to stabilize Plaintiff/Defendants life threatening vital statistics due to "withheld without cause" needed medication/supplementation.

Included with this motion is Plaintiff's affidavit of fact. See Attachment / .

Certain substantiating documents and/or medical reports are not submitted only due to T.D.C.J.'s refusal to supply them to this inmate contrary to multiple requests and Texas and Federal Law mandates! Said copies are readily available, however this Plaintiff pleads that to obtain such will require a court order as all of the exhaustive efforts by this Plaintiff have not

been responded to in any manner!

In addition, there have been numerous interruptions of both telecommunication and U.S. postal correspondences between myself and Mrs. Michaelis that has facilitated innumerous last minute, rushed correspondences to insure proper and/or timely filing(s) related to both Plaintiff/Defendants pro se' criminal and civil cases.

I plead the Court's Indulgence as I have been deprived of medication for over 4 weeks now regardless of filing Grievances and trying to get help inside the prison.

Thus Done and Signed on the 19 day of June 2013,

RESPECTFULLY SUBMITTED:
PAUL CLARENCE BAILEY, Pro Se

By:  _____

PAUL CLARENCE BAILEY, Pro Se

#01833504

~~998 County Road AA~~

~~Plainview, TX 79072~~

James Lynaugh Unit
1098 South Highway 2037
Ft Stockton TX 79735

CERTIFICATE OF SERVICE

I HEREBY CERTIFY THAT A TRUE AND CORRECT COPY OF THE FOREGOING WAS SERVED BY U.S. MAIL ON THE ~~DALLAS~~ COUNTY DISTRICT ATTORNEY'S OFFICE, 133 NORTH RIVERFRONT BOULEVARD, LB 19, DALLAS, TEXAS, 75207, ON THIS _____ DAY OF _____, 2013

By: _____
PAUL CLARENCE BAILEY, Pro Se